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*Attorneys for Defendants, Jay Barth,  
Kristopher Ledingham, Kelly Quinn, and  
Julie Williams*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DESHON HEREFORD,

Plaintiff,

v.

N. MOKA, *et.al.*,

Defendants

Case No. 2:23-cv-00345-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DISPOSITIVE  
MOTIONS  
(FIRST REQUEST)**

Defendants Jay Barth, Kristopher Ledingham, Kelly Quinn, and Julie Williams, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Jessica Brown, Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby stipulate and agree to extend the time for dispositive motions by 14 days.

In accordance with Rule 26 of the Federal Rules of Civil Procedure, with Rule 26-1 of the Local Rules of the United States District Court, District of Nevada, hereby submit their Stipulated Scheduling Order and Discovery Plan for the Court's approval. The parties met and conferred on April 17, 2024.

**I. STATEMENT OF GOOD CAUSE**

Hereford is a *pro se* inmate and has not had an opportunity to review the documents disclosed in this matter. Defendants agree to an extension of time for that reason.

**II. DISCOVERY COMPLETED PURSUANT TO LOCAL RULE 26-3**

To date, Defendants have propounded: Initial Disclosures

Plaintiff has not disclosed documents or propounded written discovery

**III. REASONS THAT DISPOSITIVE MOTIONS CANNOT BE COMPLETED**

Hereford would like additional time to review Defendants' disclosed documents and write his Motion for Summary Judgment. The parties met and conferred on April 17, 2024 and Defendants agreed to the extension.

**IV. REMAINING DISCOVERY**

Discovery is closed. No additional discovery is needed, and the parties do not anticipate circumstances that would warrant a request to reopen.

**V. PROPOSED SCHEDULE**

- Dispositive Motion Deadline April 17, 2024
- Joint Pretrial Order Deadline May 17, 2024<sup>1</sup>

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<sup>1</sup> **LR 26-1(b)(5):** Unless the discovery plan otherwise provides and the court so orders, the deadline for the joint pretrial order is 30 days after the dispositive-motion deadline. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

VI. CONCLUSION


Based upon the foregoing reasons, the Defendants request that this Court grant the requested relief and continue deadlines as requested herein.

DATED this 17th day of April, 2024,

AARON D. FORD  
Attorney General


By: /s/ Jessica Brown  
JESSICA BROWN (Bar No. 14487)  
Deputy Attorney General  
*Attorneys for Defendant(s)*

DESHON HEREFORD

By:   
Deshon Hereford  
Plaintiff, *Pro Se*

IT IS SO ORDERED that the parties' stipulation is GRANTED as amended by the Court. The proposed deadlines provided in the stipulation are erroneous. The Court will thus grant an extension of 14 days from the current dispositive motion deadline of May 3, 2024. Accordingly, the dispositive motion deadline is **May 17, 2024**. The Joint Pretrial Order deadline is **June 17, 2024**. If dispositive motions are filed, the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED: 4/18/2024

  
DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on **April 17, 2024** I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR DISPOSITIVE MOTIONS (FIRST REQUEST)** via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically.

Deshon Hereford, #1024403  
High Desert State Prison  
P. O. Box 650  
Indian Springs, NV 89070  
*Plaintiff, Pro Se*

/s/ Karen Easton  
An employee of the Office of the  
Nevada Attorney General